

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 0410080GAO

RALPH J. VOLLMANN,
Plaintiff

vs.

ROGER LYNN GRUBB and
ALLIED SYSTEMS LTD.,
Defendants

Definition: The truck: The truck and trailer operated by Roger Lynn Grubb at the time of the accident alleged in the complaint.

PLAINTIFF'S INTERROGATORIES TO DEFENDANT, ROGER LYNN GRUBB

1. Please identify yourself by stating your name, residential and business address, occupation, employer, date of birth, and if married, the name of your spouse.
2. Was the Defendant the operator of a truck which, at the time and place described in the plaintiff's complaint, was involved in an accident in which the plaintiff claims to have been injured?
3. If your answer to Interrogatory No. 2 is in the affirmative, please state:
 - a. the registration of said truck including state, number and year of registration;
 - b. the full name and address of the owner of said truck;
 - c. the full name and address of the operator of said truck.
 - d. the make, model and year of the truck operated by you at the time of the accident.
4. Please describe fully and in detail, to the best of your knowledge and belief, how the alleged accident occurred in the order in which said events took place, including in your answer your speed at the time of the accident and what lane you were in.
5. Please state from where the defendant was coming and where defendant was going at the time of the accident described in the complaint, specifying the addresses.
6. Please describe the movements of the truck operated by you for one hour prior to the collision up to and including the collision.

7. Describe all observations you made of the truck operated by the plaintiff, including its speed, from the time you first observed it until the point of impact.
8. Please describe in detail what if anything you did in an attempt to avoid the accident.
9. Please describe in detail any warning or signal given by you just prior to the accident.
10. If there were any tire marks or any other marks on the road as a result of the alleged accident, please describe said marks in detail, as to length, size, and location on the road.
11. If your truck moved at all as a result of the impact, state how far and in what direction it moved.
12. If you know of any witness relevant to the accident described in the complaint, please state the full name and address, including street and number and city or town.
13. What conversation did you have with anyone at the scene of the alleged accident and immediately following the alleged accident and before you left the scene of the alleged accident, stating with whom those conversations took place, who was present, and everything each person said concerning the accident?
14. If there were any other occupants in the defendant's truck at the time of the accident, kindly state their full name and address, including street number and city or town.
15. Was there liability insurance policy in force and effect that would provide coverage to you in the event of a judgment against you arising out the present lawsuit?
16. If your answer to preceding interrogatory is in the affirmative, please state:
 - a. the name of the insurance company or companies which was/were holding said insurance policy/policies;
 - b. the liability indemnification limits provided by the said insurance policy/policies at the time of the accident described in the complaint.
17. If the defendant expects to call an expert witness at the trial of the action please state:
 - a. the name and address of each such expert witness;
 - b. the subject matter in detail on which each such expert may be expected to testify;

18. If you had consumed any alcoholic beverages within a period of twenty-four hours prior to the collision referred to in the complaint, please state:
 - a. what you consumed;
 - b. how many drinks you had;
 - c. the time period during which you consumed the drinks.
19. Please state the names and addresses of any and all persons defendant intends to call as fact witnesses at trial, with a brief description on the subject matter of their expected testimony.
20. If you contend that the Plaintiff acted in such manner as to cause or contribute to the occurrence, give a concise statement of the facts upon which you rely.
21. State what parts of your truck were damaged and, if it was repaired, the name and address of the person who performed such repairs, the dates of such work and the cost thereof. If such truck is unrepairs, state the address and the hours at which it may be seen.
22. What part of defendant's truck came into contact with the truck operated by the plaintiff?
23. If you were on any medications at the time of the accident, please state:
 - a. all medications you were on including dosages;
 - b. all side effects you had experienced from these medications before the date of the accident;
 - c. all side effects from these medications you were experiencing just prior to the accident.
24. How many consecutive hours/minutes had you been driving at the time of the accident alleged in the complaint?
25. How many hours of sleep did you have in the four (4) days leading up to the accident, specifying what hours you slept.